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10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
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14			
15	WESTERN WATERSHEDS PROJECT, et al.,	No. 08-CV-1460 PJH	
16	Plaintiffs,	DECLARATION OF DAVID B. GLAZER	
17	v.	IN SUPPORT OF THE PARTIES' STIPULATION AND PROPOSED ORDER	
18		RE: ANSWER TO FIRST AMENDED COMPLAINT AND CONTINUING	
19	UNITED STATES FOREST SERVICE,	CASE MANAGEMENT CONFERENCE Date: CMC set for July 31, 2008	
20	Defendant.	Time: 2:30 p.m. Hon. Phyllis J. Hamilton	
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	Western Watersheds Project, et al. v. U.S. Forest Service,	No. 08-cv-1460 PJH — Decl. of David B. Glazer	

Submitted in Support of Parties' Stipulation re: Answer to First Amended Compl. and Continuing CMC

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- I am attorney of record appearing in the above-captioned matter for the Defendant United States Forest Service.
- 2. Plaintiffs filed their original complaint on March 14, 2008, challenging 25 agency decisions covering 46 grazing allotments on 9 National Forests in California. (Compl. [Dkt. #1] $\P 5.$
- 3. Plaintiffs filed a First Amended Complaint on May 30, 2008, challenging 138 decisions involving 386 allotments across 25 National Forests in 8 western states. (First Amd. Compl. [Dkt. #15] ¶ 5.)
- 4. Prior to the filing of plaintiffs' First Amended Complaint, the Parties submitted a Stipulation and Proposed Order extending the time for Defendant to respond to the anticipated amended complaint to July 3, 2008, and continuing the Case Management Conference to July 17, 2008 [Dkt. #10]. On May 19, 2008, the Court approved the Stipulation and entered the proposed Order [Dkt. #12]. A Stipulation and Proposed Order was then submitted to move the due date for the Joint ADR Certification or Notice of Need for ADR Phone Conference to the new date for the Case Management Conference Statement [Dkt. #13]. The Court approved that Stipulation and entered the Proposed Order on June 2, 2008 [Dkt. #17].
- 5. On June 24, 2008, the Court on its own motion continued the Case Management Conference to July 31, 2008.
- 6. The parties have met and conferred concerning potential avenues for case management. Specifically, Plaintiffs have proposed that the Parties initially litigate issues in connection with decisions regarding the allotments set out below and, subject to reservations concerning certain threshold issues, Defendants preliminarily agree with Plaintiffs' selection of these decisions.

California:

Lassen National Forest:

Champ's Flat, Diamond Mountain, Gooch Valley,

Lower Pine Creek, North Eagle Lake

Plumas National Forest:

Mercer

1	<u>Utah</u> :		
2		Red Castle, East Fork Black's Fork, Middle Fork Black's Fork, Lyman Lake, Little West Fork Black's Fork, Elizabeth Mountain No. 2, and Gilbert Peak/Hessie Lake-Henry's Fork	
4	Manti La Sal National Forest:	South Skyline, Booth Canyon, and Potter Canyon	
5	Fishlake National Forest:	Fremont River Ranger District	
6	<u>Idaho</u> :		
7	Caribou-Targhee National Forest:	Ashton/Island Park Nine Allotment	
8	Wyoming:		
9	Bridger-Teton National Forest:	Muddy Ridge	
11	7. The Court's <i>sua sponte</i> continuance of the Case Management Conference from		
12	July 17 to July 31, 2008, has unfortunately created a conflict for Plaintiffs' counsel. The Parties		
13	have endeavored to find a new date that works with their counsel's conflicting schedules and		
14	have arrived at August 14, 2008, as a mutually agreeable date, subject to the Court's approval.		
15	Similarly, the Parties have also agreed to file their Joint Case Management Conference		
16	Statement and Joint ADR Certification or Notice of Need for ADR Phone Conference early, on		
17	July 25, 2008, to avoid such conflicts.		
18	8. Other than the extensions referenced in Paragraph 4, above, there have been no		
19	other extensions sought in this case.		
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21	I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true		
22	and correct.		
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24	Executed this 3 rd day of July, 2008, in	the City and County of San Francisco, California.	
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26	/s/David B. Glazer		
27	DAVID B. GLAZER		
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